This document provides the instructions for filing FCC ARMIS Reports 43-01 and 43-08. It also provides instructions for filing Pole and Conduit Rental Calculation Information ("pole attachment data") formerly contained in ARMIS Report 43-01, Table III, when required as a condition of forbearance from the full ARMIS 43-01 reporting requirement. The instructions consist of the following three sections:

1. Reporting Procedures – a single document that begins on page 2 of these Instructions. These procedures are to be followed when submitting any of the ARMIS reports or pole attachment data to the Commission. Attachment A provides an illustration of a Transmittal Letter. Attachment B provides text to be included in the Certification Statement.

2. Report Definitions two documents, one providing instructions for filings of both FCC Report 43-01 and pole attachment data, and one providing the instructions for Report 43-08. Each document contains the following:

    a. Summary - overview of report-specific instructions.

    b. Report Tables - illustrations of each table, showing the rows and columns to be reported.

    c. Row Definitions - to be used in completing report tables.

    d. Column Definitions - to be used in completing report tables.

3. COSA Code Table – a single document that lists the four-letter COSA codes (CO = Company, SA = Study Area).

A. **Introduction**

This document contains details on the specific procedures to be followed when filing the FCC ARMIS Reports 43-01 and 43-08 with the Commission. It also provides specific procedures for filing pole and conduit rental calculation information ("pole attachment data") when it is required as a condition of forbearance from the ARMIS 43-01 reporting requirement.

B. **General Information**

1. **Background**

The Commission adopted ARMIS Report 43-01 in *Automated Reporting Requirements for Certain Class A and Tier 1 Telephone Companies (Parts 31, 43, 67, and 69 of the FCC's Rules)*, CC Docket No. 86-182 (1987) (*ARMIS Order*). Incumbent local exchange carriers (ILECs) with annual operating revenues for the preceding year equal to or above the indexed revenue threshold file this report. See *Reform of Filing Requirements and Carrier Classifications; Anchorage Telephone Utility, Petition for Withdrawal of Cost Allocation Manual*, CC Docket No. 96-193 (1997) (*Reform Order*). The reporting threshold for 2016 is documented in the *Annual Adjustment of Revenue Threshold*, DA 16-1058 (September 20, 2016) (*Public Notice*). ARMIS Report 43-01 is filed at the study area ("jurisdiction") level.

ARMIS Report 43-01 contains three tables. Table I contains an aggregated reporting of a carrier's financial and cost allocation data and includes a breakdown of the reporting carrier's costs between regulated and non-regulated activities as defined in their Cost Allocation Manuals and Part 64 of the FCC Rules. Table II contains a summary of the carrier's minutes of use and billable access lines. Table III contains a reporting of a carrier's pole and conduit rental cost calculation information ("pole attachment data").

In 2008, the Commission granted conditional forbearance from the ARMIS financial reporting requirements, including the ARMIS 43-01 filing requirement, to AT&T, Verizon and Qwest. See the *ARMIS Financial Reporting Forbearance Order*. The Commission conditioned forbearance on these carriers' obtaining Commission approval for compliance plans, as outlined by the *AT&T Cost Assignment Forbearance Order* and the *ARMIS Forbearance Order*, and on their continued annual public filing of pole attachment data, without assertions of confidentiality, which these carriers had been reporting in ARMIS Report 43-01, Table III. The Commission ruled further that these companies are not required to file pole attachment data for study areas in those states that certify to the Commission that they regulate pole attachments. The Commission has since granted forbearance from the ARMIS 43-01 filing requirement to all eligible price cap carriers with the same conditions as those imposed on AT&T. See the *USTelecom Forbearance Long Order*. Carriers that are subject to the ARMIS 43-01 filing requirement who have not met the conditions for forbearance are expected to file the full ARMIS Report 43-01, Tables I, II and III. See the *ARMIS Procedures Order*.

The Commission adopted ARMIS Report 43-08 in *Revision of ARMIS USOA Report (FCC Report 43-02) for Tier 1 Telephone Companies*, in 1992. ARMIS Report 43-08 provides operating data about the public network, pursuant to section 43-21(j) of the Commission's rules. All ILECs (large and mid-sized) with annual operating revenues for the preceding year equal to or above the indexed revenue threshold file this report. See the *Reform Order* and *Public Notice*. In the *ARMIS Forbearance Order*, the Commission granted forbearance to ILECs from certain portions of ARMIS Report 43-08. Therefore, as of reporting year 2008, ILECs are required to file only Table III, columns FC, DF, FE and FI. The data are filed at the operating company level.

2. **Who Must File**

   a. ARMIS Report 43-01: ILECs must file ARMIS Report 43-01 if they have annual operating revenues for the preceding year that are equal to or above the indexed threshold documented in the *Public Notice* and have not met the conditions for forbearance as prescribed in the *ARMIS Financial Reporting Forbearance Order* and the *US Telecom Forbearance Long Order*.

   b. Pole Attachment Data: Price cap carriers that have obtained Commission approval for compliance plans, as outlined by the *AT&T Cost Assignment Forbearance Order* and the *ARMIS Forbearance Order*, must continue to file pole attachment data annually and publicly as a condition of forbearance from the ARMIS 43-01 reporting obligation, except for study areas in those states that certify to the Commission that they regulate pole attachments. See the *ARMIS Financial Reporting Forbearance Order* and the *USTelecom Forbearance Long Order*.

   c. ARMIS Report 43-08: All ILECs having annual operating revenues for the preceding year that are equal to or above the indexed threshold documented in the *Public Notice* must file ARMIS Report 43-08, Table III, columns FC, DF, FE and FI.

3. **Current Revisions**

   a. Pursuant to the *ARMIS Procedures Order* and the *ARMIS Transition Date Public Notice*, effective January 1, 2015, the Electronic ARMIS Filing System (EAFS) will no longer be available for electronic submissions to the Commission. All ARMIS filings, including resubmissions, must be filed using the Commission's Electronic Comment Filing System (ECFS) in CC Docket No. 86-182, which ensures that reports are located in the same docket and will be easy to find. Data filed after January 1, 2015 will not be available for viewing or downloading, except via ECFS.

      Also effective January 1, 2015, carriers that are required to file pole attachment data, including those that had previously been filing this data in ECFS in WC Docket No. 07-204, must, going forward, file their pole attachment data in ECFS in CC Docket No. 86-182.

b. To facilitate viewing ARMIS reports in ECFS, the Commission has modified the requirements that ARMIS files be coded in ASCII and that a separate ASCII file be submitted for each report. Instead, effective January 1, 2015, carriers must submit all ARMIS reports and pole attachment data in a machine-searchable, reader-friendly file format and include, in a single ECFS filing, all reports that are required for the carrier's annual filing. See also Section C.1.a.

c. A transmittal letter and a certification statement signed by a corporate officer must still accompany each report, including filings of pole attachment data. The transmittal letter must reference CC Docket No. 86-182. See also Section D.

d. Mid-size carriers, as defined in section 32.9000, must continue to submit the certification required by section 64.905 of the Commission's rules. This certification must be submitted as part of the carrier's annual ARMIS filing in ECFS.

4. **Filing Requirements**

a. **When to File**: Affected carriers must file their annual ARMIS 43-01 and 43-08 Reports and pole attachment data by April 1 for the previous calendar year. Carriers are also legally obligated to correct any erroneous data, which includes footnotes, that have been submitted to the Commission and must refile with corrected data. An erratum (and resubmission) is required whenever there are changes in table data; or when footnotes are added, modified, or removed because they contain errors.

b. **Where to File:** As mandated in the *ARMIS Procedures Order*, effective January 1, 2015, all annual filings and resubmissions must be filed in CC Docket No. 86-182 using ECFS at http://apps.fcc.gov/ecfs/.

C. Filing ARMIS Reports and Pole Attachment Data in ECFS

1. **Electronically-Filed Data**

a. All ARMIS reports and pole attachment data must be submitted in a machine-searchable, reader-friendly file format. For the purposes of filing ARMIS reports and pole attachment data, machine-searchable is defined to mean a format that is searchable by computer. For example, tables filed in Microsoft Word format, though they will be converted to Adobe Acrobat by ECFS, will still be machine-searchable for specific information when converted. Filers must avoid submitting ARMIS reports and pole attachment data that have been scanned, or generated from any file that has been scanned, because this can compromise the readability of and ability to search the table contents. (This restriction does not apply to transmittal letters and certification statements.) Reader-friendly is defined to mean any format that can be read without computer conversion. For example, in ARMIS reports, we expect that table headers, row and column labels, footnotes, and other identifying information will be readable by the public when the file is accessed via ECFS. See the *ARMIS Procedures Order.*

b. For the annual filing due April 1 of each year, a single ECFS filing containing all required ARMIS reports, pole attachment data, associated transmittal letters and certification statements, and Part 64 certifications for all its affiliated operating companies and study areas (COSAs) should be submitted for each holding company identified in the *COSA Code Table*. This ECFS filing may contain up to four attachments that are described below:

1. **ARMIS Reports 43-01.** This attachment contains a transmittal letter, certification statement and ARMIS Reports 43-01 for all study areas of the holding company's ILECs that meet the reporting threshold and *are not* subject to a Commission-approved compliance plan. The transmittal letter and certification statement should be placed at the beginning of the attachment.
2. **Pole Attachment Data.** This attachment contains a transmittal letter, certification statement and pole attachment data for all study areas of the holding company's ILECs that meet the reporting threshold and *are* subject to a Commission-approved compliance plan. Filers with approved compliance plans are not required to submit pole attachment data for study areas in states that certify to the Commission that they regulate pole attachments. The transmittal letter and certification statement should be placed at the beginning of the attachment.
3. **ARMIS Reports 43-08.** This attachment contains a transmittal letter, certification statement and ARMIS Reports 43-08 for holding company ILECs that meet the reporting threshold. The transmittal letter and certification statement should be placed at the beginning of the attachment.
4. **Part 64 Certifications.** This attachment contains the certifications required by section 64.905.

Each attachment included in an annual ECFS filing must be given a custom description, as defined in Section C.3, and use submission number 1. Refiling of these attachments, *e.g.*, to update data and correct errors, must use the same custom description, with a higher submission number. See also Section C.2.b.

c. When resubmitting an ARMIS report or pole attachment data, filers must correct the attachment that contains the errors, using footnotes as described in Section H to identify data that have been changed; provide a new transmittal letter and certification statement, as described in Section D; and refile the attachment in ECFS *in its entirety*, using the same custom description as the previous filing, but incrementing the submission number by 1. (This same submission number must appear on all report pages within the attachment.) Attachments that are not being corrected should not be refiled. A single ECFS filing of corrected data should not include information from multiple filing periods. To file corrections for multiple filing periods, use multiple ECFS filings.

2. **Required Information**:

   a. Subject to confidentiality restrictions, each submitted ARMIS Report and pole attachment data report must contain all required information. See the Report Definition documents.

   b. Each page of each ARMIS report included in an attachment to an ECFS filing must include the report number and the table number and name. For the pole attachment data, each page must include the heading "Pole and Conduit Rental Calculation Information." In addition, each page of each ARMIS report and each page of the pole attachment data must include the operating company name, study area name (where applicable), filing period, COSA code, and submission number. The filing period identifies the year covered by the data. See the COSA Code Table (CO = Company, SA = Study Area) for a list of companies and their respective COSAs. The submission number refers to the submission number appearing in the custom description of the attachment to the ECFS filing used to submit these data. Thus, the submission number used in the custom description of the attachment must match the submission number appearing on the pages of all reports contained within the attachment. Submission number 1 must be used on all report pages for the initial annual filing. The submission number must be incremented by one each time an attachment is re-filed in ECFS. See also Sections C.1 and C.3.

   c. For the ARMIS reports and the pole attachment data, each COSA's data must be presented on a separate page(s). Do not include data for multiple COSAs on the same page.

   d. ARMIS reports and pole attachment data must not be scanned or created from files of scanned documents.

3. **Custom Description -** the custom description of each attachment to be included in a single ECFS filing has four components:

   a. the (holding) company name followed by an "_" (underscore) [Use this name consistently with all ECFS filings.]
   b. the data type (ARMIS Reports 43-01, pole attachment data, ARMIS Reports 43-08, or Part 64 Cert) followed by an "_" (underscore)
   c. the filing period (four-digit calendar year for which the data is being reported) followed by an "_" (underscore)
   d. one digit for the submission number (submission 1 must be used for the initial annual ECFS filing. A higher number 2, 3, etc., must be used each time an attachment is refiled.)

For example, the custom description of the four attachments that might be included in the single ECFS filing by "XYZ Telco" for its initial annual filing on April 1, 2016 would be:

XYZ Telco_ARMIS Reports 43-01_2016_1
XYZ Telco_Part 64 Certs_2016_1
XYZ Telco_ARMIS Reports 43-08_2016_1
XYZ Telco_Pole Attachment Data_2016_1

When a resubmission is required for "XYZ Telco's" ARMIS Report 43-08, for example, the custom description of the attachment to be included in the ECFS filing would be:

XYZ Telco_ARMIS Reports 43-08_2016_2

4. **Submit a Filing**

~~a. Once you have filled out the formbutton to go to the Review & Confirmation page. Use this page to review the information entered on the ECFS *Submit a Filing* form to ensure accuracy. If further revisions are needed, click "Modify your Submission" to go back and make the necessary changes. If everything is correct, click **Confirm** to formally file the data with the Commission.~~

~~c.~~a. ~~Your filing is formally submitted to the Commission once you see the confirmation page containing a confirmation number you can use to track your filing status. **Print out the confirmation page for your records.** Use the link provided at the bottom of the screen to track filing status and navigate to the Check Your Filing Status screen~~Use the ECFS Standard Filing "form" to submit a filing to the Commission. [**Note: Do not use ECFS to submit any data for which confidential treatment is requested. See Section E for instructions on filing confidential data**.]

Complete each section as follows:

1. **Proceeding** ~~Number~~ – Enter "86-182".
2. **Name of Filer** -- Enter the name of the holding company submitting the filing. ~~Contact Information –~~
~~2.~~3. **Primary Contact Email** -- Enter the email address where the Commission can contact someone if it has questions about or problems with the ECFS filing.
   - ~~**Name of Filer: Enter the name of the holding company submitting the filing.**~~
   - ~~**Email Address: Enter the email address where the Commission can contact someone if it has questions about or problems with the ECFS filing.**~~
~~5.~~4. ~~**Details/**~~**Type of Filing** – Select "Report" from the drop down menu.
~~6.~~5. **Address** – ~~Enter the address where the FCC can contact you if there is any follow-up required. There are two rows of buttons to choose from before entering your address information.~~ In the **Address** ~~**For**~~ **Of** field, use the default choice "Filer" and enter the address for the entity you put in the **Name of Filer** field.
~~7.~~6. **Upload Documents** –

i. ~~File Name:~~ Click ~~the browse button~~inside the box to ~~select the file~~upload a file -to attach to the single ECFS filing. (The ECFS User Guide, which is available by clicking on the ribbon at https://www.fcc.gov/ecfs/help/ecfs, describes the file formats ECFS will accept.)

ii. ~~Custom~~ When prompted to enter a ~~custom~~ description for ~~each~~ the attachment, enter the required **custom description** as specified in Section C.3.

~~ii.~~iii. Repeat steps i. and ii. above until all required files have been attached. Annual ARMIS filings may contain up to four attachments.

~~8.~~7. **Email Confirmation** – Check the box to receive an email confirmation of the submission.

b. ~~Once you have filled out the form~~After entering this information, click "**Continue to review screen.**" When satisfied with your entries, click "Submit" to formally file the data with the Commission. When ECFS accepts the filing, it will return a confirmation page and confirmation number that can be used later to track the status of the filing. **Take note of this number.** (If you opted earlier to receive an email confirmation of your submission, you will also receive the confirmation number in the email.) You may check the status of your filing by entering the confirmation number at https://www.fcc.gov/ecfs/filing/status/search.~~button to go to the Review & Confirmation page. Use this page to review the information entered on the ECFS *Submit a Filing* form to ensure accuracy. If further revisions are needed, click "Modify your Submission" to go back and make the necessary changes. If everything is correct, click **Confirm** to formally file the data with the Commission.~~

~~Your filing is formally submitted to the Commission once you see the confirmation page containing a confirmation number you can use to track your filing status. **Print out the confirmation page for your records.** Use the link provided at the bottom of the screen to track filing status and navigate to the Check Your Filing Status screen~~

Additional help filing documents in ECFS is available from the Commission web site at https://www.fcc.gov/ecfs/help/ecfs.

~~The confirmation verifies that ECFS has received the filing. However, a filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, viruses, or automated links to other documents. For a list of common reasons for rejected submissions, please see *Rejected Documents*.~~

D. **Related Documents**

1. **Transmittal Letters**: Each filed attachment to either an annual ECFS filing or a resubmission must include a separate letter of transmittal. These letters must be on official company letterhead and must contain the following information:

   a. Reference to CC Docket No. 86-182.

b. Identify the type of attachment (*i.e.*, ARMIS Reports 43-01, 43-08 or pole attachment data), the filing period (year), the name of the holding company providing the information, and the submission number of the attachment. For a resubmission, also provide the reason for the filing, which must include a brief description of **ALL** data (including footnotes) that have been added, removed, or modified; and indicate which companies'/study areas' data have been affected. This description must agree with what is being filed.
c. Contact information where the Commission can contact you if any follow-up is required. Contact information must include name, telephone number and email address.

Transmittal Letters may be scanned. (See Attachment A for a sample transmittal letter.)

2. **Certification Statements:**

a. Carriers must certify the accuracy of the data submitted in ARMIS Reports and pole attachment data by including a certification statement, signed by a corporate officer, in each filed attachment to an annual ECFS filing or resubmission. The statement must identify the attachment type, *i.e.*, ARMIS Reports 43-01, 43-08, or pole attachment data; the filing period (year) and the submission number. (See Attachment B for the text to be included in the certification statement.)

b. Part 64 Certification: Mid-sized ILECs, as defined by Part 32.9000, shall certify compliance with Part 64.901 of the Commission's rules (see Part 64.905) by filing a certification annually. Certifications must be (i) signed, under oath, by an officer of the company, (ii) display an official company letterhead, and (iii) list all operating companies impacted by the filing. Part 64 Certifications must be included in a separate attachment to the annual filing.

c. Certification statements may be scanned.

E. **Confidential Treatment**: The Commission does not anticipate that any data currently required under ARMIS are confidential. However, for confidential filings, the carrier would file a redacted version (public version) in ECFS and then file a confidential paper copy with the Secretary's Office. The confidential version must contain all the required information. Each page of the confidential filing should be labeled "CONFIDENTIAL." The public version should not include data for which the carrier is seeking confidential treatment.

F. **ILEC Changes Requiring Additional Information**: When a company makes one or more internal procedural changes that would result in single or multiple data discontinuities, a footnote must be provided with the data detailing the nature of and reason for the discontinuities. The footnote must describe both the former and new procedures in enough detail to explain any significant changes in data trends.

G. **Data Items That Are "Not Available" or are "Withheld"**

1. **Not Available**: Applicable to all reports, the term "Not Available" is used to refer only to those items that the Commission has ruled are not applicable to a particular row/column, or are not required for a particular filing entity. These items are indicated by an "N/A" in the report table illustrations that are found in the Report Definition documents. The confidential version must contain values for all of the data items except those items which are "Not Available." If a report includes a field such as a sum, a ratio, or a percentage that cannot be computed completely and accurately because it relies on another item which the Commission has ruled is a "Not Available" item, then that field is also considered to be "Not Available." Items that need not be reported because they do not apply should be designated by N/A in carrier filings.

2. **Withheld**: Applicable to all reports, except pole attachment data, the term "Withheld" is used to refer only to those items for which the carrier has applied for confidential treatment with the Commission and is only applicable to the public version. If a field such as a sum, a ratio or a percentage relies on an item or items which have been withheld and that field is not also withheld, then it must include the withheld amount. For example, a carrier could withhold the individual values for two of three numbers, which are totaled. If the carrier does not also apply for confidential treatment for the total, then that total must be the sum of all three numbers, not just the one that was not withheld. The public version must contain values for all of the data items except those items that are "Not Available" or those items which have been "Withheld." If a public version report is filed, enter W/H in any numeric data filed for which data are "Withheld."

H. **Footnotes**

1. **General**:

a. For initial (annual) filings, if any data for the current period differ substantially from those for the previous period and the difference is not self-explanatory but was caused by unusual circumstances, the carrier must include detailed footnote text to explain the specific circumstances. For resubmission filings, footnotes must be provided for

all changed data, which includes changed footnotes. When a summary row value changes because of changes to one or more of its detail rows, the summary row must also be footnoted.

b. Footnotes should be filed for the entities to which they apply

c. If the reporting carrier does not follow the procedures described in the row and column instructions of the applicable Report Definition, it must explain any deviations from those procedures in an explanatory footnote. Such footnotes must provide detailed explanations of the procedures actually used by the carrier and its specific reasons for deviating from procedures prescribed by the Commission's Rules. This provision should not be interpreted to mean that deviations from the prescribed rules will automatically be approved by the Commission.

EXAMPLES:

Do <u>not</u> say, "Data are compiled using a more inclusive process than in previous filing."
Do say, "Data are compiled using a process that includes xxx, which was not included in previous filings. The impact of including xxx in this row inflates this number by x% over the previous reporting period."

Do <u>not</u> say, "This value was not calculated pursuant to the instructions."
Do, say "This value was calculated using the xxx method rather than the method described in the instructions because..."

Do <u>not</u> say, "Submission corrects data that were incorrect in previous submission."
Do say, "$xxxx is changed to $yyyy because ..."

Do <u>not</u> say, "Waiver" or Waiver Granted."
Do say, "Waiver of Part xx.xxx was granted in CC Docket No. xx-xxx, X FCC, xxxx (1992) to allow Any Company to ... because ..."

d. Footnote entries must provide detailed explanations for only those items reported in the current ECFS filing. Footnotes from prior ECFS filings should be included only if they remain applicable. In other words, when a resubmission nullifies a pre-existing footnote, remove the footnote.

e. For resubmissions, remove footnotes if they no longer apply, and renumber the remaining footnotes.

f. When removing one or more footnotes from a table that were erroneously included in a previous ECFS filing, provide a single explanatory footnote that includes a list of the affected rows and columns.

g. Footnotes should appear at the bottom of a table. Use numerical superscripts to indicate a footnote. If the footnote applies to a single data entry, place the superscript on the entry. If it applies to an entire row and or column, footnote the row or column header.

2. **Mandatory**: Certain items require accompanying mandatory footnotes and those items are specified in the Report Definition for each report. An example of items with mandatory footnote requirements is any row/column data entry in any ARMIS Report that contains UNE data. An explanatory footnote is required to identifying the types of UNEs (*e.g.*, "UNE-P") reported.

I. **Errata**

1. Carriers are under a legal obligation to correct any erroneous data, which includes footnotes, reported in ARMIS Reports and pole attachment data. Thus, whenever there are changes in table data; or footnotes are added, modified, or removed because they were erroneously filed, an erratum (and resubmission) is required. See Section C of the Reporting Procedures for the use of submission numbers when an erratum occurs.

2. ECFS filings containing corrected data must include footnotes to indicate which data items were corrected since the previous submission of the data in ECFS. If the data items being corrected impact other data items in the report, then those items must also be corrected and footnoted. Erratum footnotes should reflect only those items corrected in the new ECFS filing. Footnotes from prior ECFS filings must not be included in the new ECFS filing. Erratum footnotes should appear at the bottom of a table. See Section H for appropriate use of footnotes.

3. The ECFS serves as the repository for official records in the FCC's docketed proceedings and rulemakings. It does not provide data validation tools. Therefore, carriers should thoroughly review data prior to filing with the Commission to avoid the need to submit a revised ECFS filing.

J. **Waivers**

1. If a carrier determines that it will be unable to provide data required by an ARMIS report, it must file an application for waiver with the Commission following established Commission procedures. All such requests from a carrier should be included in a single application. The application must demonstrate good cause for reporting a different or lower level of detail and indicate how these deficiencies will be corrected.

2. Carriers should not act upon requests for waiver until waivers are granted. It is important that carriers be aware that waivers are not in effect until they are granted, in writing, by the Commission or under delegated authority.

3. Omission of individual data items or entries, without request for waiver, is unacceptable. One reason that compliance with the full requirements is so important is that omission of any single data entry by any carrier will jeopardize the accuracy of aggregate industry information.

K. **Extension of Filing Time**: Requests for extensions of filing time must be made in a timely manner. Requests received less than 72 hours prior to a filing date are *prima facie* unreasonable.

L. **Public Information**

1. Effective January 1, 2015, the EAFS is no longer be available for electronic submissions to the Commission. Reports must be filed using the Commission's ECFS at http://apps.fcc.gov/ecfs/. All ARMIS filings and pole attachment data, including resubmissions, are to be made in CC Docket No. 86-182. Although no further electronic submissions will be accepted via EAFS, the Commission anticipates that the links will remain active on the ARMIS pages of the Commission's website so that data from earlier ARMIS filings can be accessed in the same manner as in the past. Data filed after January 1, 2015 are not available for viewing or downloading, except via ECFS. Reporting procedures (instructions) for the ARMIS Reports and pole attachment data are accessible through the Commission's ARMIS web page at http://www.fcc.gov/wcb/armis/.

2. Public Internet Access is available at the FCC Reference Information Center (RIC), 445 Twelfth Street, S.W., Washington, D.C. Parties should contact the RIC at (202) 418-0270.

M. **Contact Information**

1. **Filers**: Filers requiring further information regarding these procedures, contact: Lorenzo Miller~~Barbara Van Hagen~~, FCC Wireline Competition Bureau, Industry Analysis and Technology Division, (202) 418-0940.

2. **Public**: Questions from the public about ARMIS and pole attachment data should be directed to armis-hp@fcc.gov.

SAMPLE TRANSMITTAL LETTER

<Company's letter head>
<Dated>

Federal Communications Commission
Office of the Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

Re: CC Docket No. 86-182

Report: (*Only one type of report per transmittal letter, i.e.,* FCC Report 43-01, FCC Report 43-08, or Pole Attachment Data)

Year of Data: (*Only one year per transmittal letter, e.g.,* 2016)

Submission Number: *(1 for initial annual submissions; see section C.2.b of the Reporting Procedures for additional information about submission numbers.)*

Dear Ms. Dortch:

Pursuant to the Commission's *Revisions to ARMIS Filing Procedures Order* (DA 14-1387), released September 24, 2014, CompanyName is providing the attached <*if a resubmission*, amended,> ARMIS Reports 43-08 for calendar year 2014~~4~~6.

<For resubmissions provide the COSA or COSAs affected and a brief descriptive explanation of data corrected. >

One-COSA example:
"Illinois Bell (LBIL), is filed to correct data reported in Table III, column (fi). Column (fi) is the summation of columns (fc) through (fe), which was reported incorrectly, due to a keying error in the previous submission."

Multiple-COSAs example:

COSAs
LBIL
NBIN

"Data for the above Ameritech COSAs are filed to correct data reported in Table III, column (fi). Column (fi) is the summation of columns (fc) through (fe), which was reported incorrectly, due to a keying error in the previous submissions."

(*Note: A transmittal letter may contain multiple reasons for multiple COSAs or one COSA with multiple reasons but only for one report and one year.*)

<Any other pertinent information>
<Contact information: include name, telephone number and email address>
<List of Attachments>

CERTIFICATION

I certify that I am an officer of <***Company***>; I have examined these ARMIS Reports <***Report Number***>, (or Pole Attachment Data), and to the best of my knowledge, information, and belief, all statements of fact contained in the attached reports are true and these reports are accurate statements of the affairs of the above named respondent in respect to the data set forth herein for the period from <***01/01/20XX***> to <***12/31/20XX***>, and Submission Number <***X***>.

PRINTED NAME:

POSITION:

SIGNATURE:

DATE:

(Persons making willful false statements in this report can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).)

CONTACT PERSON:

TELEPHONE NUMBER:

EMAIL ADDRESS: